

# **Exhibit A**

**Second Declaration of Chris Beyrer, MD, MPH (May 20, 2020)  
("Second Beyrer Decl.")**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

UNITED STATES OF AMERICA,

*Plaintiff,*

V.

ALI AL-TIMIMI,

*Defendant.*

Case No. 1:04-cr-385 (LMB)

## SECOND DECLARATION OF CHRIS BEYRER, MD, MPH

Under 28 U.S.C. § 1746, I, Chris Beyrer, state the following:

1. As described in my first declaration, I am a professor of Epidemiology, International Health, and Medicine at the Johns Hopkins Bloomberg School of Public Health, where I regularly teach courses in the epidemiology of infectious diseases. This current semester, I am teaching the epidemiology course on emerging infections at Hopkins. I am a member of the National Academy of Medicine, a former President of the International AIDS Society, and a past winner of the Lowell E. Bellin Award for Excellence in Preventive Medicine and Community Health. I have been active in infectious diseases Epidemiology since completing my training in Preventive Medicine and Public Health at Johns Hopkins in 1992. Over the course of my career, I have at various times studied and published on the spread of infectious diseases within prisons.

2. I am currently actively at work on the COVID-19 pandemic in the United States. Among other activities I am the Director of the Center for Public Health and Human Rights at Johns Hopkins, which is active in disease prevention and health promotion among vulnerable populations, including prisoners and detainees, in the US, Africa, Asia, and Latin America.

3. I have been following the spread of COVID-19 throughout correctional and detention facilities in the United States and have the following observations and recommendations based upon my education and years of experience in the field of public health and epidemiology.

4. I have reviewed the Declaration of Susan Conroy describing the inmate medical records of Ali Al-Timimi. From an epidemiological perspective, I do not share Dr. Conroy's assessment that Mr. Al-Timimi is not at higher risk for severe illness from COVID-19.

5. Based on current epidemiological evidence, Mr. Al-Timimi's recent uncontrolled hypertension alone puts him at great risk for a severe outcome. One of the more striking observations about COVID-19 has been the increasing awareness of both stroke and cardiovascular complications with the disease. Hypertension has emerged as one of the more important underlying conditions that predispose people for worse outcomes upon infection with this virus. In addition, Mr. Al-Timimi's age (over 50), male gender, and underlying pulmonary condition (asthma) add to this risk.

6. I am a full-time researcher and professor. I am not a clinical provider at present, and have not treated Mr. Al-Timimi. But in my epidemiological assessment, Mr. Al-Timimi is at significantly elevated risk for a COVID-19 complication.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 20th day of May, 2020.

A handwritten signature in dark ink, appearing to read "Chris Beyrer", with a stylized, cursive script.

---

Professor Chris Beyrer, MD, MPH